

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

RECEIVED  
DEC 16 2020  
CLERK, U.S. DISTRICT COURT  
MINNEAPOLIS, MINNESOTA

vs. Plaintiff(s), Case No. 20-cv-2553 SRN/ECW  
(To be assigned by Clerk of District Court)

DEMAND FOR JURY  
TRIAL  
YES ☒ NO ☐

Defendant(s).  
(Enter the full name(s) of ALL plaintiffs and defendants in this lawsuit. Please attach additional sheets if necessary.)

COMPLAINT

SCANNED  
DEC 16 2020  
U.S. DISTRICT COURT MPLS

PARTIES

1. List your name, address and telephone number. Do the same for any additional plaintiffs.

a. Plaintiff

Name Derrick Devon Turner  
Street Address 23255 Park Street  
County, City Hennepin, Excelsior  
State & Zip Code Minneapolis 55331  
Telephone Number 612.261.8944

2. List all defendants. You should state the full name of the defendant, even if that defendant is a government agency, an organization, a corporation, or an individual. Include the address where each defendant may be served. Make sure that the defendant(s) listed below are identical to those contained in the above caption.



## a. Defendant No. 1

Name

Thyssenkrupp Elevator

Street Address

40 51<sup>st</sup> way NE suite 300

County, City

Hennepin, Minneapolis

State &amp; Zip Code

Minnesota 55331

## b. Defendant No. 2

Name

OTIS Elevator

Street Address

2772 Cleveland Ave N

County, City

Hennepin Roseville, ~~Minneapolis~~ (Hennepin)

State &amp; Zip Code

Minnesota 55113

## c. Defendant No. 3

Name

Elevator Construction Union

Street Address

433 Little Canada Rd East

County, City

Ramsey, St. Paul #2

State &amp; Zip Code

Minnesota 55117

**NOTE: IF THERE ARE ADDITIONAL PLAINTIFFS OR DEFENDANTS, PLEASE PROVIDE THEIR NAMES AND ADDRESSES ON A SEPARATE SHEET OF PAPER.**

**Check here if additional sheets of paper are attached: ☐**

**Please label the attached sheets of paper to correspond to the appropriate numbered paragraph above (e.g., Additional Defendants 2.d., 2.e., etc.)**

## JURISDICTION

Federal courts are courts of limited jurisdiction. Generally, two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of

the parties. Under 28 U.S.C. § 1331, a case involving the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one state sues a citizen of another state and the amount of damages is more than \$75,000 is a diversity of citizenship case.

3. What is the basis for federal court jurisdiction? (check all that apply)

☒ Federal Question

☒ Diversity of Citizenship

4. If the basis for jurisdiction is Federal Question, which Federal Constitutional, statutory or treaty right is at issue? List all that apply.

Title VII of the Civil Rights Act of 1964  
(42 U.S.C. 2000e and Duty of fair Representation)

5. If the basis for jurisdiction is Diversity of Citizenship, what is the state of citizenship of each party? Each Plaintiff must be diverse from each Defendant for diversity jurisdiction.

Plaintiff Name: Derrick Devon Turner State of Citizenship: Illinois

Defendant No. 1: Otis Elevators State of Citizenship: Minnesota

Defendant No. 2: Local 9 Union State of Citizenship: Minnesota

Attach additional sheets of paper as necessary and label this information as paragraph 5.

Check here if additional sheets of paper are attached. ☒

6. What is the basis for venue in the District of Minnesota? (check all that apply)

☒ Defendant(s) reside in Minnesota ☐ Facts alleged below primarily occurred in Minnesota

☒ Other: explain

All businesses  
and union located in Minnesota

#### STATEMENT OF THE CLAIM

Describe in the space provided below the basic facts of your claim. The description of facts should include a specific explanation of how, where, and when each of the defendants named in the caption violated the law, and how you were harmed. Each paragraph must be numbered separately, beginning with number 7. Please write each single set of circumstances in a separately numbered paragraph.

7. ① OTIS Elevator fired me because I'm black.

- ② Thyssenkrupp Elevator Worker called me Racial Slurs. Management fired me without ever speaking to me and refuse to pay money promised to me, money owed.
- ③ OTIS Elevator Retaliated because I made safety claims and our prior situation where my union forced them to pay me 2 weeks pay.
- ④ OTIS Elevator literally claims I a person can lift 1000 pounds and Reason for my termination.
- ⑤ Local 9 Elevator Union acknowledged the racial discrimination from both OTIS and Thyssenkrupp Elevators which I have on record but then forced me to go to Otis elevators knowing the harassment I was receiving from the Company. I have all this documented.
- ⑥ All these situations<sup>4</sup> caused me to lose my career

Attach additional sheets of paper as necessary.

Check here if additional sheets of paper are attached: ☒

Please label the attached sheets of paper to as Additional Facts and continue to number the paragraphs consecutively.

### REQUEST FOR RELIEF

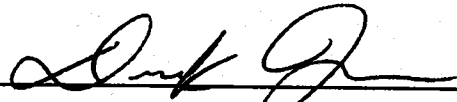
State what you want the Court to do for you and the amount of monetary compensation, if any, you are seeking.

I am seek <sup>compensation for</sup> damages,  
emotional disstress,  
My entire potential earning plus  
full pension, and more...  
Seeking legal Representation

Date:

December 15, 2020

Signature of Plaintiff



Mailing Address

23255 Park Street,  
Excelsior, 55331 MN

Telephone Number

612-261-8944

**Note:** All plaintiffs named in the caption of the complaint must date and sign the complaint and provide his/her mailing address and telephone number. Attach additional sheets of paper as necessary.